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LIFE INSURANCE COMPANY OF NORTH AMERICA and

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Attorneys for Plaintiff

JOSEPH HOWARD CARSELLO,

formerly known as HOWARD MCDONOUGH

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

JOSEPH HOWARD CARSELLO, formerly
known as HOWARD MCDONOUGH,

Plaintiff,

v.

LIFE INSURANCE COMPANY OF
NORTH AMERICA and MACY'S INC.
LONG TERM DISABILITY PLAN,

) CASE NO. 3:13-cv-03749 JSC

)

) **STIPULATION TO EXTEND TIME**
) **FOR DEFENDANTS TO RESPOND TO**
) **PLAINTIFF'S COMPLAINT;**
) **~~PROPOSED~~ ORDER**

)

) **Judge:** Hon. Jacqueline Scott Corley

)

)

1 Defendants.)
 2)

3 IT IS HEREBY STIPULATED by and between the parties hereto through their
 4 respective attorneys that Defendants LIFE INSURANCE COMPANY OF NORTH AMERICA
 5 and MACY'S INC. LONG TERM DISABILITY PLAN may have additional time within which
 6 to answer or otherwise respond to plaintiff's complaint. Therefore, the last day for defendant to
 7 answer or otherwise respond to plaintiff's complaint is Thursday, September 26, 2013.

8 Good cause exists for this extension as defense counsel has just been assigned to this case
 9 and requires time to become knowledgeable about the case to prepare an initial pleading.
 10 Additionally, defense counsel will be out of town from August 28, 2012 through September 7,
 11 2013 and September 14, 2013 through September 21, 2013 on business.

12 This document is being electronically filed through the Court's ECF System. In this
 13 regard, counsel for Defendants hereby attests that (1) the content of this document is acceptable
 14 to all persons required to sign the document; (2) Plaintiff's counsel has concurred with the filing
 15 of this document; and (3) a record supporting this concurrence is available for inspection or
 16 production if so ordered.

17
 18
 19 **RIMAC MARTIN, P.C.**

20 DATED: August 28, 2013

By: /s/ Anna M. Martin

ANNA M. MARTIN

Attorneys for Defendants

21 LIFE INSURANCE COMPANY OF NORTH
 22 AMERICA and MACY'S INC. LONG TERM
 23 DISABILITY PLAN
 24
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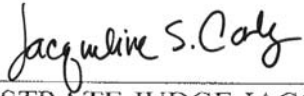
LEWIS FEINBERG LEE RENAKER &
JACKSON P.C.

DATED: August 28, 2013

By: /s/ Joshua Davidson
JOSHUA DAVIDSON
Attorneys for Plaintiff
JOSEPH HOWARD CARSELLO,
formerly known as HOWARD MCDONOUGH

Pursuant to stipulation, **IT IS SO ORDERED.**

Dated: August 29, 2013


MAGISTRATE JUDGE JACQUELINE SCOTT
CORELY